

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BODUM USA INC., and PI-DESIGN AG,

Plaintiffs,

v.

STARBUCKS CORPORATION,

Defendant.

No. 1:23-cv-02946

Judge: Hon. Andrea R. Wood

AMENDED JOINT STATUS REPORT

Pursuant to the Court’s Minute Entry dated February 27, 2025 (Dkt. No. 79), Plaintiffs Bodum USA Inc. and Pi-Design AG (collectively, “Bodum”), and Defendant Starbucks Corporation (“Starbucks”) (collectively, the “Parties”), filed a Joint Status Report with the date for the deposition of former Starbucks CEO Howard Schultz and a proposed briefing schedule for Starbucks forthcoming Motion for Summary Judgment.

Mr. Schultz’s schedule required the parties to reschedule his deposition. This Amended Joint Status Report includes the new date for Mr. Schultz’s deposition and a revised proposed briefing schedule for Starbucks Motion for Summary Judgment.

A. Scheduling of Final Deposition

On September 27, 2024, the Parties completed briefing on Starbucks Motion for Protective Order with respect to Bodum’s subpoena for the deposition of former Starbucks CEO Howard Schultz (Dkt. Nos. 58, 63, 66). During the Parties’ status conferences in January and February 2025, the Court stated that it anticipated denying the Motion for Protective Order but ordering limitations on the deposition of Mr. Schultz. The Parties respectfully request the Court’s written

order and guidance regarding the aforementioned limitations so as to be able to proceed with the deposition of Mr. Schultz.

The Parties tentatively agree to hold a virtual deposition of Mr. Schultz on April 17, 2025, starting at 11:30 a.m. PDT, pending receipt of the Court's order on Starbucks Motion for Protective Order.

B. Proposed Schedule for Briefing of Dispositive Motions

As stated during the status conference on February 27, 2025, Starbucks anticipates filing a dispositive motion on (i) liability with respect to Bodum's breach of contract claim, and (ii) Starbucks counterclaim for declaratory judgment. Bodum does not plan to file any dispositive motions on liability.

The Parties propose the following briefing schedule for Starbucks dispositive motion:

- May 9, 2025 – Starbucks Opening Brief (memorandum of law no more than 35 pages)
- June 6, 2025 – Bodum's Opposition Brief (memorandum of law no more than 35 pages)
- June 27, 2025 – Starbucks Reply Brief (memorandum of law no more than 20 pages)

C. Telephonic Status Hearing

The Parties do not require a telephonic status hearing.

DATED: March 17, 2025

Respectfully Submitted,

BODUM USA, INC.
PI-DESIGN AG

STARBUCKS CORPORATION

By: /s/ James Griffith
One of Their Attorneys

By: /s/ Brian J. Smith
One of Its Attorneys

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